

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

MARVELL SEMICONDUCTOR, INC.  
MARVELL ASIA PTE., LTD., and MARVELL  
INTL., LTD,

Plaintiffs and  
Counterdefendants,

V.

COMMONWEALTH SCIENTIFIC AND  
INDUSTRIAL RESEARCH ORGANISATION,

Defendant and  
Counterclaimant.

Civil Action No. 6-07-CV-204 LED

## Jury Trial Demanded

**DECLARATION OF D. JEFFREY RAMBIN IN SUPPORT OF MOTION TO COMPEL  
SONY COMPUTER ENTERTAINMENT AMERICA, INC. AND SONY  
ELECTRONICS, INC. TO PRODUCE 30(B)(6) DEPONENTS**

I, D. Jeffrey Rambin, declare as follows:

I am an attorney at the law firm of Capshaw DeRieux LLP and counsel of record for CSIRO. I am a member of the bar of the State of Texas. If called upon to do so, I could and would testify truthfully as follows:

1. Attached hereto as Exhibit A are true and correct copies of the November 23, 2009 subpoena and deposition notice issued to Sony Computer Entertainment America, Inc., along with the return of service for the same.

2. Attached hereto as Exhibit B are true and correct copies of the November 23, 2009 subpoena and deposition notice issued to Sony Electronics, Inc., along with the return of service for the same.

3. Attached hereto as Exhibit C is a true and correct copy of email correspondence with Dan Herp, Counsel Sony Computer Entertainment America, Inc, from December 2 to December 10, 2009.

4. Attached hereto as Exhibit D are true and correct copies of a January 20, 2010 email to Dan Herp of Sony Computer Entertainment America, Inc., along with the cases attached to that email.

5. Attached hereto as Exhibit E is a true and correct copy an email conversation with Dan Herp of Sony Computer Entertainment America, Inc., which took place on January 27-28, 2010.

6. Attached hereto as Exhibit F is a true and correct copy of a November 30, 2009 letter from Aaron Muranaka, counsel for Sony Electronics, Inc.

7. Attached hereto as Exhibit G are true and correct copies of the December 2, 2009 certificate of non-appearance regarding Sony Computer Entertainment America, Inc., along with the exhibits thereto, which include a letter from SCEA acknowledging receipt of the subpoena.

8. Attached hereto as Exhibit H are true and correct copies of the November 30, 2009 certificate of non-appearance regarding Sony Electronics, Inc., along with the exhibits thereto.

9. Attached hereto as Exhibit I are true and correct copies of the January 21, 2010 subpoena and deposition notice issued to Sony Computer Entertainment America, Inc., along with the return of service for the same.

10. Attached hereto as Exhibit J are true and correct copies of the January 21, 2010 subpoena and deposition notice issued to Sony Electronics, Inc., along with the return of service for the same.

11. Attached hereto as Exhibit K are true and correct copies of the January 28, 2010 certificate of non-appearance regarding Sony Computer Entertainment America, Inc., along with the exhibits thereto.

12. Attached hereto as Exhibit L are true and correct copies of the January 28, 2010 certificate of non-appearance regarding Sony Electronics, Inc., along with the exhibits thereto.

13. Attached hereto as Exhibit M is a true and correct copy of email correspondence with Warren Heit from January 29 to February 2, 2010.

14. Attached hereto as Exhibit N is a true and correct copy of email correspondence with Julieta Lerner from January 22 to February 23, 2010.

15. Attached hereto as Exhibit O is a true and correct copy of the Motion to Quash hearing in MicroUnity v. Dell, 2:04-cv-00120-TJW.

16. Attached hereto as Exhibit P is a true and correct copy of portions of Sony Corporation's SEC form 20-F reporting as of March 31, 2009, as downloaded from the investor relations website of Sony Corporation.

17. Attached hereto as Exhibit Q is a true and correct copy of a "Letter to Shareholders" by the CEO of Sony Corp, as downloaded from the investor relations website of Sony Corp.

18. Attached hereto as Exhibit R is a true and correct copy of a webpage advertising the PS3 from sony.net,.

19. Attached hereto as Exhibit S is a true and correct copy of the Sony Corporation of America Factsheet, available from sony.com.

20. Attached hereto as Exhibit T is a true and correct copy of PS3 marketing done by SCA, available from sony.com.

21. Attached hereto as Exhibit U is a true and correct copy PS3 marketing done by Sony Computer Entertainment, Inc., as seen on its website.

22. Attached hereto as Exhibit V is a true and correct of the About Sony Computer Entertainment America page, as available on SCEA's website.

23. Attached hereto as Exhibit W is a true and correct copy of PS3 marketing done by SCEA, available from its website.

24. Attached hereto as Exhibit X is a true and correct copy of the Sony Electronics Corporate Overview, as available on SEL's website.

25. Attached hereto as Exhibit Y is a true and correct copy of PS3 marketing done by SEL via the SonyStyle website.

26. Attached hereto as Exhibit Z is a true and correct copy of the biographies of Sir Howard Stringer, Nicole Seligman, and Kaz Hirai, as maintained on the website of SCEA.

27. Attached hereto as Exhibit AA is a true and correct copy of Sony Corporation organizational structure information, as maintained on the website of Sony Corporation.

28. Attached hereto as Exhibit BB is a true and correct copy of the statements of Kaz Hirai, as given in an interview to the Times of UK and as shown on their website.

29. Attached hereto as Exhibit CC is a true and correct copy of correspondence with Warren Heit regarding the stipulation for answer extension.

30. Attached hereto as Exhibit DD is a true and correct copy of correspondence between counsel for CSIRO and counsel for Marvell regarding the stipulation.

20. Attached hereto as Exhibit EE is a true and correct copy of the revised stipulation circulated by Marvell on March 11, 2010.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12<sup>th</sup> day of March 2010 in Longview, Texas.

/s/ D. Jeffrey Rambin

D. Jeffrey Rambin